

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

BOBBY MORRIS, individually and on behalf  
of all others similarly situated,

Plaintiff,  
v.

SONIC INDUSTRIES SERVICES, LLC,

Defendant.

Case No. 4:25-cv-00035-JMB

Hon. John M. Bodenhausen

**DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

Defendant Sonic Industries Services, LLC (“Defendant”), by and through its undersigned counsel, hereby respectfully moves to dismiss the putative class action Complaint (*see* Dkt. 1) filed by Plaintiff Bobby Morris in the above-captioned matter, in its entirety, pursuant to Fed. R. Civ. P. 12(b)(6) for failure to state a claim for relief. The specific bases for this Motion are set forth in Defendant’s Memorandum of Law, filed concurrently herewith and incorporated herein by reference.

WHEREFORE, for the reasons provided in its Memorandum of Law, and for such other reasons as may be presented to the Court prior to ruling hereon, Defendant respectfully requests that this Court enter an order dismissing Plaintiff’s entire Complaint, and granting all other just relief.

Dated: March 5, 2025

Respectfully submitted,

By: /s/ A. Paul Heeringa

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*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on, March 5, 2025, a true copy of the foregoing was filed electronically using the Court's CM/ECF system, to be served via operation of the Court's electronic filing system upon all counsel of record.

*/s/ A. Paul Heeringa*

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